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REMARKS

Claims 25-48 are rejected, under 35 U.S.C. § 102(b), as being anticipated by Orsinger '900. The Applicant acknowledges and respectfully traverses the raised anticipatory rejection in view of the following remarks.

In response to the raised rejection and upon review of the cited prior art, the claims are amended to more clearly and explicitly recite the features by which the present invention is patentably distinguished over the cited prior art. In particular, it will be noted that previously pending claims 25-48 are canceled, without admission regarding the subject matter thereof with respect to the cited prior art or prejudice with respect to the subject matter therein, in favor of new claims 49-64. It will be noted that new claim 49 essentially comprises the subject matter of previously pending claims 25-28 and that new claim 52 essentially comprises the subject matter of previously pending claims 31-33. It will also be noted that new claims 50-51 correspond generally to previously pending claims 29 and 30 and that new claims 53-64 correspond generally to previously pending claims 34-38 and 40-48. It will also be apparent that these amendments to the claims are fully supported by the specification and the claims, as originally filed, and that the amendments to the claims do not add any new subject matter to the present invention, the specification or the claims.

It is respectfully submitted that this combination of the presently claimed subject matter is inventive over the applied citation of Orsinger '900 under the requirements and provisions of 35 U.S.C. § 102 and/or 35 U.S.C. § 103. For example, and in fundamental contrast from the present invention as recited in independent claims 49 and 52, Orsinger '900 relates to a mechanism for handling and stuffing envelopes that is almost entirely mechanical in nature. That is, the Orsinger '900 essentially uses only fingers, clamps, brackets, lugs, wedges, belts and similar purely mechanical means to manipulate the envelopes and materials to be placed in the envelopes. In particular with respect to the present invention, the only use the Orsinger '900 mechanism makes of air pressures or currents is the use of sucker 43

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describes, for example, at column 3, lines 56-71, to guide a leading edge of a thin paper insert into the grip of a set of gripping fingers and anvils.

Orsinger '900 therefore does not teach, suggest or disclose, as recited in claims 49 and 52, the limitation of generating at least one stream of air and by a rotary cam moving an envelope flap into contact with the cylindrical control drum or holding the envelope flap against said exterior surface of the control drum by radial suction produced inside said cylindrical control drum so that each envelope is individually and successively displaced by pulling its flap placed against the exterior surface of said control drum towards a zone for introduction of one of said documents or one of said objects, as presently claimed.

Further in this regard, the present invention is additionally distinguished over and from Orsinger '900 because Orsinger '900 fails to teach, suggest, disclose or hint at the use of a scraper tangential to the control drum to detach the envelopes from the drum and, in fact, it is respectfully submitted that such a feature will serve no purpose in Orsinger '900 because Orsinger '900 uses purely mechanical mechanisms, and not air pressure, to manipulate and hold the envelopes during and following stuffing of the envelopes.

It is therefore the Applicant's belief and position that the present invention, as recited in independent claims 49 and 52 and thereby in dependent claims 50, 51 and 53-64, is fully and patentably distinguished over and from the teachings, suggestions and/or motivations of Orsinger '900 for at least the reasons discussed above. The Applicant, therefore, respectfully requests that the Examiner reconsider and withdraw all rejections of the claims under either, or both, 35 U.S.C. § 102 and/or 35 U.S.C. § 103 in view of Orsinger '900, and allow claims 49-64 as presented herein above.

If any further amendment to this application is believed necessary to advance prosecution and place this case in allowable form, the Examiner is courteously solicited to contact the undersigned representative of the Applicant to discuss the same.

In view of the above amendments and remarks, it is respectfully submitted that all of the raised rejection(s) should be withdrawn at this time. If the Examiner disagrees with the

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Applicant's view concerning the withdrawal of the outstanding rejection(s) or applicability of the Orsinger '900 reference, the Applicant respectfully requests the Examiner to indicate the specific passage or passages, or the drawing or drawings, which contain the necessary teaching, suggestion and/or disclosure required by case law. As such teaching, suggestion and/or disclosure is not present in the applied references, the raised rejection should be withdrawn at this time. Alternatively, if the Examiner is relying on his/her expertise in this field, the Applicant respectfully requests the Examiner to enter an affidavit substantiating the Examiner's position so that suitable contradictory evidence can be entered in this case by the Applicant.

In view of the foregoing, it is respectfully submitted that the raised rejection(s) should be withdrawn and this application is now placed in a condition for allowance. Action to that end, in the form of an early Notice of Allowance, is courteously solicited by the Applicant at this time.

The Applicant respectfully requests that any outstanding objection(s) or requirement(s), as to the form of this application, be held in abeyance until allowable subject matter is indicated for this case.

In the event that there are any fee deficiencies or additional fees are payable, please charge the same or credit any overpayment to our Deposit Account (Account No. 04-0213).

Respectfully submitted,



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